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**Subject:** Letter from 90 experts on IRIS to National Academies

Ninety people in total – scientists and community leaders - signed on to the letter supporting the EPA IRIS chemical hazard assessment program. I will present the letter as comments to the National Academies meeting later this week.

A direct link to the final letter is here:

<https://www.nrdc.org/resources/nrdc-scientists-and-community-leaders-support-national-academies-2018-review-epa-iris>

And, my blog about it, with links, is below:

<https://www.nrdc.org/experts/jennifer-sass/chemical-hazard-assessments-shouldnt-be-polluters-prize>

EXPERT BLOG › JENNIFER SASS

## Chemical Hazard Assessments Shouldn't Be Polluter's Prize

January 30, 2018 Jennifer Sass

A tug of war is taking place this week in Washington DC that will pit environmental health scientists against polluters and their Washington insider allies. The battle ground is the National Academies of Sciences (NAS) – the Nation's premiere scientific institute providing non-partisan objective guidance for policy makers. The prize is EPA's premiere chemical hazard assessment program, the Integrated Risk Information System (IRIS; See NAS DELS-BEST-17-03).

IRIS is a very valuable prize, because the IRIS Toxicity Values (how much exposure to a chemical can cause how much cancer or other health harm in a person or community) are used by regulators at the EPA, by local, state and regional governments, and around the world to set health-based limits for chemicals in air, water, food or soil. IRIS assessments are also used by forward-thinking and sustainable chemical and product manufacturers, fabricators, and retailers to build safer and more sustainable products.

# Dichloromethane

CASRN 75-09-2

- [Toxicological Review \(PDF\)](#) (567 pp, 5.15 M)
- [IRIS Summary \(PDF\)](#) (44 pp, 337 K)


Key IRIS Values

History

Noncancer Assessment


Reference Dose for Oral Exposure (RfD) (PDF) (44 pp, 337 K)

Last updated: 11/18/2011

System	RfD (mg/kg-day)	Basis	PoD	Composite UF
 Hepatic	$6 \times 10^{-2}$	Hepatic effects (hepatic vacuolation, liver foci)	BM <sub>DL</sub> <sub>10</sub> (HEC): 0.29 mg/kg-day	30

Reference Concentration for Inhalation Exposure (RfC) (PDF) (44 pp, 337 K)

Last updated: 11/18/2011

System	RfC (mg/m <sup>3</sup> )	Basis	PoD	Composite UF
 Hepatic	$6 \times 10^{-2}$	Hepatic effects (hepatic vacuolation)	BM <sub>DL</sub> <sub>10</sub> (HEC): 17.2 mg/m <sup>3</sup>	30

Critical  
Effect  
Systems

Hepatic

Tumor Sites

Hepatic

Respiratory

[https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance\\_nmbr=70](https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance_nmbr=70)

If the independent objective science wins, then the IRIS program will continue to be fully funded, staff will be supported, and its Toxicity Values will continue to provide the global public with reliable, transparent, credible scientific IRIS chemical hazard assessments and toxicity values.

If toxic chemical manufacturers and polluters win, then the IRIS program will likely be shifted from EPA's Office of Research and Development (ORD) and into the Office of Chemical Safety and Pollution Prevention (OCSPP) which regulates pesticides and toxic chemicals, and which is now run by the regulated industry and polluters. Such a shift is called for in the current Senate FY2018 Appropriations Bill (see Minority Response). The regulated chemical industry's opposition to the IRIS program is well-documented and long-standing (see NRDC 2011 report documenting industry manipulations and abuses).

This shift would move IRIS from a science and research office to a regulatory policy office under the management of Nancy Beck, a chemical industry lobbyist prior to her recent political appointment at EPA. Dr. Beck's previous foray into developing risk assessment guidelines was a failure, as

evidenced by the NAS conclusion that the draft government-wide risk assessment bulletin which she authored while at the Office of Management and Budget (OMB) was “fundamentally flawed” and the unprecedented recommendation for its withdrawal (NAS 2007).

Moving the IRIS program to Beck’s Toxics Office would surely destroy the IRIS program’s good work and progress, that earned it praise in its previous National Academies review (NAS 2014), and more recently praise from EPA’s independent Science Advisory Board (SAB, Sept 2017), whose own independence is also under severe attack, as the Trump EPA replaces independent academic experts with anti-regulatory, climate-denier, and industry appointees.

In short, IRIS is in a fight for its life, as EPA political appointees tighten the noose. The protection of EPA’s scientific independence and integrity is of great concern to state environmental and health departments, manufacturers, businesses, scientists, academics, health professionals, and the public. That’s why NRDC and over 90 scientists, environmental health experts, medical professionals, and community leaders have signed a letter of support for the IRIS Program as it is under siege by the chemical manufacturers. We hope that the 2018 National Academies review will provide support for the IRIS program to continue as an independent chemical assessment program committed to using the best scientific methods for ensuring protection for public health and the environment.

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*Let there be no peace without justice, no worker without rights, no child without future, no elder without care, no individual without dignity. Let us take great care of Mother Earth. (adapted from Pope Francis on the Poor and Indigenous Peoples)*